

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
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JULIO SANTIAGO, et al.                    )

CRIMINAL NO.: 04-10336-NMG

**UNITED STATES' AMENDED LIST OF POTENTIAL WITNESSES**

The United States of America, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William F. Bloomer, Assistant U.S. Attorney, hereby submits the following list of witnesses for trial in the above-referenced matter.

Government Witnesses

1.     DEA Task Force Agent (TFA) Marco Chavez  
       Lowell Police Department
2.     Special Agent (SA) Michael O'Shaughnessy  
       Drug Enforcement Administration (DEA)
3.     Detective William John Samaras  
       Lowell Police Department
4.     SA Calice Couchman  
       DEA
5.     Lt. Terry G. Hanson  
       Massachusetts State Police
6.     SA Todd Prough  
       DEA
7.     TFA David Chartrand  
       DEA
8.     Detective Felix Figueroa  
       Lowell Police Department
9.     Detective Christopher Hanson  
       Lowell Police Department
10.    SA Greg Willoughby  
       DEA

11. TFA Kevin Swift  
Salem Police Department, NH
12. TFA Brian Proulx  
Haverhill Police Department
13. SA Glenn Colletti  
DEA
14. TFA Greg Hudson  
Lowell Police Department
15. Detective James Faye  
Lowell Police Department
16. Sgt. Stephen Walsh  
Mass. State Police
17. SA Eric Kotchian  
ATF
18. Chemist John E. Drugan  
Mass. State Police Crime Lab
19. Richard Vasquez  
ATF
20. Officer Peter Kelleher  
Lowell Police Department
21. Detective Christopher Doolin  
Lowell Police Department
22. Sgt. James Trudell  
Lowell Police Department
23. SA James Connolly  
DEA
24. Trooper John Jakobowski  
Massachusetts State Police
25. Lt. Brian O'Hara  
Massachusetts State Police (retired)
26. Michael Oppenheim  
ATF

27. Trooper Jamie Cepero  
Massachusetts State Police
28. Trooper Mark Capponett  
Massachusetts State Police
29. Trooper David Crouse  
Massachusetts State Police
30. Detective John K. Loney  
NYPD
31. SA Norton Cordova  
DEA
32. Della Saunders  
Chemist, Department of Public Health
33. Michael Lawler  
Chemist, Department of Public Health
34. Xiu Ying Gao  
Chemist, Department of Public Health
35. Mai Ngoc Tran  
Chemist, Department of Public Health
36. Detective Bryan McMahon  
Lowell Police Department
37. Lawrence Giordano  
Essex County Sheriff's Department
38. SA Dennis Barton  
DEA
39. Detective Mark Rivet  
Lawrence Police Department
40. Lt. Greg Dern  
Massachusetts State Police
41. Detective Joseph Jakutis  
Dracut Police Department
42. Sgt William Canty  
Massachusetts State Police

43. Detective Linda Coughlin  
Lowell Police Department
44. SA Kevin Frye  
DEA
45. Trooper Robert S. MacAllister  
Massachusetts State Police
46. Sergeant David Chartrand  
Dracut Police Department
47. Trooper Joseph Masterson  
Massachusetts State Police
48. Detective Jose Rivera  
Lowell Police Department
49. Sgt. Barry Golner  
Lowell Police Department
50. Officer David Ferry  
Lowell Police Department
51. Detective Ann Lessieur  
Lowell Police Department
52. Detective Daniel Ahern  
Chelmsford Police Department
53. Lydia L. Gonzalez  
Lowell Police Department
54. Sandra Lipchus  
Chemist, Department of Public Health
55. Nancy Tisei  
Chemist, Department of Public Health
56. Detective Kelly Richardson  
Lowell Police Department
57. Jennifer Chu  
DEA Chemist
58. Michael Frayne  
DEA Forensic Analyst

59. Detective Cuebas  
NYPD

60. Sandra Lipchus  
Chemist, Department of Public Health

Civilian Witnesses

61. David Joly, Fitchburg, MA

62. James Mellor, Leominster, MA

63. Allen Ottens, Lowell, MA

64. Michael Noble, Lowell, MA

Keeper of the Records

65. AT&T Wireless

66. Nextel

67. Sprint PCS

68. T-Mobile

69. KeySpan

70. ComCast

71. MetroCall Wireless

72. New England Paging

73. Massachusetts Department of Public Health

74. Massachusetts Registry of Motor Vehicles

The government reserves the right to amend or supplement the above witness list at any time prior to or during trial. By including the names of "potential" witnesses, the government makes no representation as to whether it will actually call any of the above-listed individuals as witnesses at trial. Should

the defendant desire the attendance of any of the above witnesses at trial, she/he should serve them with appropriate process or contact the undersigned prosecutor to see if arrangements can be made for their production.

This list does not include witnesses that the United States may determine are necessary for rebuttal. The United States reserves its right to amend its witness list at any time before the commencement of trial. The United States will notify counsel immediately if any such additions or amendments are made.

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ William F. Bloomer  
WILLIAM F. BLOOMER  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I, William F. Bloomer, hereby certify that this document filed through the ECF system on October 2, 2006, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants this date via US Postal Service, postage prepaid.

/s/William F. Bloomer  
WILLIAM F. BLOOMER

Date: 2 October 2006